

Appl. No. 09/805,791  
Atty. Docket No. 8381  
Amdt. Dated October 10, 2003  
Reply to Office Action of 04/10/2003  
Customer No. 27752

### REMARKS

Claims 1-72 are pending in the present application. No amendments to the claims or specification have been made in this Response.

### Rejections Under 35 USC 103(a)

Claims 1, 13-14, 31, and 55 have been rejected under 35 USC 103(a) as being unpatentable over Turnbull (US Patent 5,208,765). Applicants respectfully traverse this rejection. Turnbull does not establish a *prima facie* case of obviousness because it does not teach or suggest all of Applicants' claim limitations of independent Claims 1, 31, and 55 (or of dependent Claims 13-14) – including in particular because it does not disclose a structured relational database.

Turnbull refers to a product control matrix 100 (Figure 1, Col. 4, line 3) that operates in conjunction with a data and result documentation database 110 (Figure 2; Col. 4, line 4) and a requirement description database 120 (Figure 2, Col. 4, line 5). The specification of Turnbull contains disclosure indicating the nature of these databases and what is meant or implied by the phrase "operates in conjunction with" in regard to the databases. As requirements are completed, the results and data supporting those results are entered in the data and result documentation database 110 (Col. 4, line 8). Each requirement is provided with a short identifier, and when the requirement is done, the product control matrix indicates such completion by, for example, entering a "Y" (Col. 4, line 58). The product control matrix 100 of Turnbull is used to determine status of product development or production (Col. 4, lines 14-16). This informs the person of requirements that have been completed or not completed. The person can ascertain any problems (such as may be indicated by an incomplete requirement) by accessing the description of any incomplete requirements and contacting the group or groups responsible for completing that requirement (Col. 4, lines 20 – 24). The requirement description database 110, presumably, is accessed to facilitate this activity. A person can separately access the data and results database 120, which contains histories of the product development (Col. 4, lines 47-48) to access the data and results that have been entered.

Each of these databases of Turnbull appear to contain separate and distinct information. Nowhere is it disclosed in Turnbull that any of these databases contain structured data or are structured relational databases. In a structured relational database, data would exist in defined data fields that would enable each data point to be migrated or integrated into one or more data presentations (or other collections or combinations of data). That functionality is not disclosed or suggested in Turnbull.

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A further point of distinction between Turnbull and the present invention is that Turnbull relates primarily to a method and system for monitoring product development or production lifecycle. The "requirements" of Turnbull's product control matrix and pertain to completion of tasks or stages of development/production processes (e.g., quality assurance started, build sheet released, etc.; see for example Col. 19, lines 20 - 39). On the otherhand, Applicants' invention relates to a method and system for managing actual technical specifications of products. This is reflected in the limitations in independent Claims 1, 31, and 55 pertaining to storing of technical requirements data such as product data, material data, and packaging data in a structured relational database. Even if the data and results database or requirement description database of Turnbull contains technical product data, there is no teaching or suggestion in Turnbull to store such data as structured data in a structured relational database. Furthermore, Applicants respectfully point out that mere assignment of meta data or meta tags to unstructured documents or data would not transform an unstructured database into a structured relational database.

The remaining claims (Claims 2-12, 15-30, 32-54, and 56-72) have been rejected under 35 USC 103(a) as being unpatentable over Turnbull in view of Bowman-Amuah (US Patent 6,438,594; hereinafter referred to as "Bowman"). Applicants respectfully assert that Bowman contains no teachings or disclosure that overcome the shortcomings of Turnbull, as discussed above, and therefore the remaining claims are unobvious over the cited combination of Turnbull in view of Bowman.

#### Conclusion

In light of the above remarks, it is requested that the Examiner reconsider and withdraw the rejection under 35 USC 103(a). Applicants respectfully request reconsideration of this application and allowance of Claims 1-72.

Respectfully submitted,

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